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15 November 2023

NT Environmental Protection Authority  
Submission lodged via online portal

To Whom it May Concern,

**RE: Castile Resources Pty Ltd proposes to develop the Rover 1 Project**

The Arid Lands Environment Centre (ALEC) is Central Australia's peak environmental advocacy organisation, a not-for-profit managed on behalf of its 200+ members by a voluntary Board of Governance, the CEO and ALEC team. ALEC has a 40 year history of successfully advocating for our local environment.

We write in response to the proponent initiated environmental impact statement (EIS) referral for the Castile Resources Pty Ltd Rover 1 Project, including proponent drafted Terms of Reference for the EIS, and a proponent Statement of Reasons for why an EIS is required.

ALEC considers that this is a significant proposal. We are deeply concerned by the environmental risks associated with this proposal. We have grave reservations that this site appears unsuitable for mining, tailings dams and processing activities and linear infrastructure to the site, given it contains groundwater dependent ecosystems (GDEs) and bilby habitat. Important in themselves, GDEs will also become increasingly important and rare bilby habitat due to GDEs' resilience to climate change and sources of biodiversity and cultural values<sup>1</sup>.

In particular we are concerned that the application says there are no terrestrial GDEs (p6 referral report):

"The closest potential GDE (unclassified) is a wetland approximately 10 km to the south-west of the Project area. The EPBC Act allows for the listing of threatened ecological communities - of which there is only one in the NT, the Arnhem Plateau Sandstone Shrubland Complex. This does not occur within the Project area."

Yet the application identifies very shallow groundwater as the site (just 6m below the ground) and describes the vegetation types described are characteristic of GDEs

"Significant vegetation types: There are no significant vegetation types, (e.g., closed forest, sandsheet heath and vegetation containing large trees with hollows suitable for fauna as defined by the NT Land Clearing Guidelines). Two locally important habitat tree species were observed and will be considered when designing the Project to minimise general biodiversity impacts: Large Bloodwoods (*C. opaca*) have potential to be hollow bearing; however, no significant hollowbearing trees were recorded (potentially a consequence of fire history in the area). Ghost Gum (*C.*

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<sup>1</sup> <https://territorystories.nt.gov.au/10070/868537> (p.V)

aparrerinja) were also noted within or adjacent to Project components. These trees (when mature) can be considered to hold local / regional biodiversity significance. There are no groundwater-dependent ecosystems (GDEs) within the Project area. "

We therefore consider there are terrestrial GDEs present. These GDEs are likely to be refuges during climate change induced droughts, because these retain access to water during periods of extreme temperatures and low rainfall. **Therefore this location is not only suitable habitat for the bilby but will be of increasing importance and rarity due to climate change**

The presence of terrestrial GDEs, impacts on GDEs and risks to GDEs and bilby habitat needs to be defined and assessed. The assessment needs to include risks associated:

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- groundwater drawdown
- water disposal
- Dewatering
- Tailings dams and overland flow
- Linear infrastructure to the site
- Fuel and chemical storage
- Waste disposal

And provide sufficient information on bilby habitat and risks it faces from the loss of GDEs and the abovementioned risks

While we acknowledge the EIS process is designed to assess these risks, we are of the view that the proposal is likely to be found unsuitable as it is incompatible with protecting increasingly important bilby habitat. We encourage the NTEPA to design a comprehensive assessment process, that maximises the opportunities for public to make informed submissions.

Your sincerely,